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SAN MATEO COUNTY

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN MATEO

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

vs.

LINDA HASKIN-GOLOGORSKY


SAN MATEO, CA 94404

AKA LINDA HASKIN, LINDA TENENBAUM
Defendant.

REPORT NO. DI16102701
DA CASE NO. 0747410

17SF003374A
FELONY COMPLAINT

I, the undersigned, say, on information and belief, that in the County of San Mateo, State of California:

COUNT 1: PC118(a) (Felony)

On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Perjury Under Oath in violation of PC118(a), a Felony, was committed in that LINDA HASKIN-GOLOGORSKY being a person who, having taken an oath that he/she would testify, declare, depose,

1 and certify truly before a competent tribunal, officer, and person, to wit, Honorable Raymond Swope,
2 in a case in which such an oath may by law be administered, to wit, a court trial, did contrary to such
3 oath state as true a material matter which he/she knew to be false.

4 COUNT 2: PC664/PC487(a) (Felony)
5

6 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
7 Attempted Grand Theft Of Real Property in violation of PC664/PC487(a), a Felony, was committed
8 in that LINDA HASKIN-GOLOGORSKY did unlawfully attempt totake certain real property, to wit,
9 [REDACTED] Foster City, CA , of a value exceeding Nine Hundred Fifty Dollars (\$950),
10 the property of Jonathan Golgorsky.

11 COUNT 3: PC460(b) (Felony)
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13 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Second
14 Degree Commercial Burglary in violation of PC460(b), a Felony, was committed in that LINDA
15 HASKIN-GOLOGORSKY did enter a commercial building occupied by Superior Court of
16 California, San Mateo County with the intent to commit larceny and any felony.

17 COUNT 4: PC134 (Felony)
18

19 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
20 Preparing False Documentary Evidence in violation of PC134, a Felony, was committed in that
21 LINDA HASKIN-GOLOGORSKY did unlawfully prepare a false and ante-dated book, paper,
22 record, instrument in writing, and other matter and thing, with intent to produce it, and to allow it to
23 be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and
24 inquiry whatever, authorized by law.

25 COUNT 5: PC132 (Felony)

1 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Offering
2 False Evidence in violation of PC132, a Felony, was committed in that LINDA HASKIN-
3 GOLOGORSKY offered as true at a trial, proceeding, inquiry and investigation whatever, authorized
4 by law, a book, paper, document, record and instrument in writing, knowing the same to have been
5 forged, fraudulently altered, and ante-dated.

6 COUNT 6: PC115(a) (Felony)

7 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
8 Procuring And Offering False Or Forged Instrument in violation of PC115(a), a Felony, was
9 committed in that LINDA HASKIN-GOLOGORSKY did unlawfully and knowingly procure and
10 offer a false and forged instrument to be filed, registered, and recorded in a public office within this
11 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state
12 or the United States.

13 COUNT 7: PC134 (Felony)

14 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
15 Preparing False Documentary Evidence in violation of PC134, a Felony, was committed in that
16 LINDA HASKIN-GOLOGORSKY did unlawfully prepare a false and ante-dated book, paper,
17 record, instrument in writing, and other matter and thing, with intent to produce it, and to allow it to
18 be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and
19 inquiry whatever, authorized by law.

20 COUNT 8: PC132 (Felony)

21 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Offering
22 False Evidence in violation of PC132, a Felony, was committed in that LINDA HASKIN-
23 GOLOGORSKY offered as true at a trial, proceeding, inquiry and investigation whatever, authorized
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1 by law, a book, paper, document, record and instrument in writing, knowing the same to have been
2 forged, fraudulently altered, and ante-dated.

3 COUNT 9: PC115(a) (Felony)

4 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
5 Procuring And Offering False Or Forged Instrument in violation of PC115(a), a Felony, was
6 committed in that LINDA HASKIN-GOLOGORSKY did unlawfully and knowingly procure and
7 offer a false and forged instrument to be filed, registered, and recorded in a public office within this
8 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state
9 or the United States.

11 ENHANCEMENT 1

12 PC115.5(a): Special Allegation Filing False Documents Relating To Single-Family Residences

13 It is further alleged as to Count 9 that the defendant, LINDA HASKIN-GOLOGORSKY filed and
14 forged a document and instrument with the county recorder which affected title to, placed an
15 encumbrance on, and placed an interest secured by a mortgage and deed of trust on, real property,
16 which consisted of not more than four dwelling units, with knowledge that the document was false
17 and forged.

18 COUNT 10: PC134 (Felony)

19 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
20 Preparing False Documentary Evidence in violation of PC134, a Felony, was committed in that
21 LINDA HASKIN-GOLOGORSKY did unlawfully prepare a false and ante-dated book, paper,
22 record, instrument in writing, and other matter and thing, with intent to produce it, and to allow it to
23 be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and
24 inquiry whatever, authorized by law.

1 COUNT 11: PC132 (Felony)

2 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Offering
3 False Evidence in violation of PC132, a Felony, was committed in that LINDA HASKIN-
4 GOLOGORSKY offered as true at a trial, proceeding, inquiry and investigation whatever, authorized
5 by law, a book, paper, document, record and instrument in writing, knowing the same to have been
6 forged, fraudulently altered, and ante-dated.

7 COUNT 12: PC115(a) (Felony)

8 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
9 Procuring And Offering False Or Forged Instrument in violation of PC115(a), a Felony, was
10 committed in that LINDA HASKIN-GOLOGORSKY did unlawfully and knowingly procure and
11 offer a false and forged instrument to be filed, registered, and recorded in a public office within this
12 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state
13 or the United States.

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15 ENHANCEMENT 1

16 PC115.5(a): Special Allegation Filing False Documents Relating To Single-Family Residences

17 It is further alleged as to Count 12 that the defendant, LINDA HASKIN-GOLOGORSKY filed and
18 forged a document and instrument with the county recorder which affected title to, placed an
19 encumbrance on, and placed an interest secured by a mortgage and deed of trust on, real property,
20 which consisted of not more than four dwelling units, with knowledge that the document was false
21 and forged.

22 COUNT 13: PC134 (Felony)

23 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
24 Preparing False Documentary Evidence in violation of PC134, a Felony, was committed in that

1 LINDA HASKIN-GOLOGORSKY did unlawfully prepare a false and ante-dated book, paper,
2 record, instrument in writing, and other matter and thing, with intent to produce it, and to allow it to
3 be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and
4 inquiry whatever, authorized by law.

5 COUNT 14: PC132 (Felony)

6 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Offering
7 False Evidence in violation of PC132, a Felony, was committed in that LINDA HASKIN-
8 GOLOGORSKY offered as true at a trial, proceeding, inquiry and investigation whatever, authorized
9 by law, a book, paper, document, record and instrument in writing, knowing the same to have been
10 forged, fraudulently altered, and ante-dated.

11 COUNT 15: PC115(a) (Felony)

12 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
13 Procuring And Offering False Or Forged Instrument in violation of PC115(a), a Felony, was
14 committed in that LINDA HASKIN-GOLOGORSKY did unlawfully and knowingly procure and
15 offer a false and forged instrument to be filed, registered, and recorded in a public office within this
16 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state
17 or the United States.

18 COUNT 16: PC530.5(a) (Felony)

19 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Identity
20 Theft in violation of PC530.5(a), a Felony, was committed in that LINDA HASKIN-
21 GOLOGORSKY did willfully and unlawfully obtain personal identifying information of Alan
22 Axelrod and used that information for an unlawful purpose and to obtain, and attempt to obtain
23 credit, goods, services, real property, and medical information without the consent of Alan Axelrod .

24 COUNT 17: PC115.5(b) (Felony)

1 On or about October 13, 2016, in the County of San Mateo, State of California, the crime of False
2 Sworn Statement To Notary Public in violation of PC115.5(b), a Felony, was committed in that
3 LINDA HASKIN-GOLOGORSKY did make a false sworn statement to a notary public, with
4 knowledge that the statement was false in order to induce the notary public to perform an improper
5 notarial act on the instrument and document affecting title to and placing an encumbrance on real
6 property consisting of a single-family residence containing not more than four dwelling units.

7 COUNT 18: PC134 (Felony)

8 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
9 Preparing False Documentary Evidence in violation of PC134, a Felony, was committed in that
10 LINDA HASKIN-GOLOGORSKY did unlawfully prepare a false and ante-dated book, paper,
11 record, instrument in writing, and other matter and thing, with intent to produce it, and to allow it to
12 be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and
13 inquiry whatever, authorized by law.

14 COUNT 19: PC132 (Felony)

15 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Offering
16 False Evidence in violation of PC132, a Felony, was committed in that LINDA HASKIN-
17 GOLOGORSKY offered as true at a trial, proceeding, inquiry and investigation whatever, authorized
18 by law, a book, paper, document, record and instrument in writing, knowing the same to have been
19 forged, fraudulently altered, and ante-dated.

20 COUNT 20: PC115(a) (Felony)

21 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
22 Procuring And Offering False Or Forged Instrument in violation of PC115(a), a Felony, was
23 committed in that LINDA HASKIN-GOLOGORSKY did unlawfully and knowingly procure and
24 offer a false and forged instrument to be filed, registered, and recorded in a public office within this
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1 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state
2 or the United States.

3 COUNT 21: PC134 (Felony)

4 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
5 Preparing False Documentary Evidence in violation of PC134, a Felony, was committed in that
6 LINDA HASKIN-GOLOGORSKY did unlawfully prepare a false and ante-dated book, paper,
7 record, instrument in writing, and other matter and thing, with intent to produce it, and to allow it to
8 be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and
9 inquiry whatever, authorized by law.

10 COUNT 22: PC132 (Felony)

11 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Offering
12 False Evidence in violation of PC132, a Felony, was committed in that LINDA HASKIN-
13 GOLOGORSKY offered as true at a trial, proceeding, inquiry and investigation whatever, authorized
14 by law, a book, paper, document, record and instrument in writing, knowing the same to have been
15 forged, fraudulently altered, and ante-dated.

16 COUNT 23: PC115(a) (Felony)

17 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
18 Procuring And Offering False Or Forged Instrument in violation of PC115(a), a Felony, was
19 committed in that LINDA HASKIN-GOLOGORSKY did unlawfully and knowingly procure and
20 offer a false and forged instrument to be filed, registered, and recorded in a public office within this
21 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state
22 or the United States.

23
24 ENHANCEMENT 1

1 PC115.5(a): Special Allegation Filing False Documents Relating To Single-Family Residences

2 It is further alleged as to Count 23 that the defendant, LINDA HASKIN-GOLOGORSKY filed and
3 forged a document and instrument with the county recorder which affected title to, placed an
4 encumbrance on, and placed an interest secured by a mortgage and deed of trust on, real property,
5 which consisted of not more than four dwelling units, with knowledge that the document was false
6 and forged.

7 COUNT 24: PC472 (Felony)

8 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
9 Counterfeit Seal in violation of PC472, a Felony, was committed in that LINDA HASKIN-
10 GOLOGORSKY did unlawfully and with intent to defraud, forge and counterfeit a seal and did
11 falsely make forge and counterfeit an impression purporting to be an impression of said seal, and did
12 possess such counterfeited seal and impression, knowing it to be counterfeited and did conceal the
13 fact that the seal was counterfeit.

14 COUNT 25: PC134 (Felony)

15 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
16 Preparing False Documentary Evidence in violation of PC134, a Felony, was committed in that
17 LINDA HASKIN-GOLOGORSKY did unlawfully prepare a false and ante-dated book, paper,
18 record, instrument in writing, and other matter and thing, with intent to produce it, and to allow it to
19 be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and
20 inquiry whatever, authorized by law.

21 COUNT 26: PC132 (Felony)

22 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Offering
23 False Evidence in violation of PC132, a Felony, was committed in that LINDA HASKIN-
24 GOLOGORSKY offered as true at a trial, proceeding, inquiry and investigation whatever, authorized

1 by law, a book, paper, document, record and instrument in writing, knowing the same to have been
2 forged, fraudulently altered, and ante-dated.

3 COUNT 27: PC115(a) (Felony)

4 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
5 Procuring And Offering False Or Forged Instrument in violation of PC115(a), a Felony, was
6 committed in that LINDA HASKIN-GOLOGORSKY did unlawfully and knowingly procure and
7 offer a false and forged instrument to be filed, registered, and recorded in a public office within this
8 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state
9 or the United States.

11 ENHANCEMENT 1

12 PC115.5(a): Special Allegation Filing False Documents Relating To Single-Family Residences

13 It is further alleged as to Count 27 that the defendant, LINDA HASKIN-GOLOGORSKY filed and
14 forged a document and instrument with the county recorder which affected title to, placed an
15 encumbrance on, and placed an interest secured by a mortgage and deed of trust on, real property,
16 which consisted of not more than four dwelling units, with knowledge that the document was false
17 and forged.

18 COUNT 28: PC472 (Felony)

19 On or about October 25, 2016, in the County of San Mateo, State of California, the crime of
20 Counterfeit Seal in violation of PC472, a Felony, was committed in that LINDA HASKIN-
21 GOLOGORSKY did unlawfully and with intent to defraud, forge and counterfeit a seal and did
22 falsely make forge and counterfeit an impression purporting to be an impression of said seal, and did
23 possess such counterfeited seal and impression, knowing it to be counterfeited and did conceal the
24 fact that the seal was counterfeit.

COUNT 29: PC134 (Felony)

On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Preparing False Documentary Evidence in violation of PC134, a Felony, was committed in that LINDA HASKIN-GOLOGORSKY did unlawfully prepare a false and ante-dated book, paper, record, instrument in writing, and other matter and thing, with intent to produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law.

COUNT 30: PC132 (Felony)

On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Offering False Evidence in violation of PC132, a Felony, was committed in that LINDA HASKIN-GOLOGORSKY offered as true at a trial, proceeding, inquiry and investigation whatever, authorized by law, a book, paper, document, record and instrument in writing, knowing the same to have been forged, fraudulently altered, and ante-dated.

COUNT 31: PC115(a) (Felony)

On or about October 25, 2016, in the County of San Mateo, State of California, the crime of Procuring And Offering False Or Forged Instrument in violation of PC115(a), a Felony, was committed in that LINDA HASKIN-GOLOGORSKY did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

ENHANCEMENT 1

PC115.5(a): Special Allegation Filing False Documents Relating To Single-Family Residences

1 It is further alleged as to Count 31 that the defendant, LINDA HASKIN-GOLOGORSKY filed and
2 forged a document and instrument with the county recorder which affected title to, placed an
3 encumbrance on, and placed an interest secured by a mortgage and deed of trust on, real property,
4 which consisted of not more than four dwelling units, with knowledge that the document was false
5 and forged.

6 COUNT 32: PC115(a) (Felony)

7 On or about December 19, 2016, in the County of San Mateo, State of California, the crime of
8 Procuring And Offering False Or Forged Instrument in violation of PC115(a), a Felony, was
9 committed in that LINDA HASKIN-GOLOGORSKY did unlawfully and knowingly procure and
10 offer a false and forged instrument to be filed, registered, and recorded in a public office within this
11 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state
12 or the United States.

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14 ENHANCEMENT 1

15 PC115.5(a): Special Allegation Filing False Documents Relating To Single-Family Residences

16 It is further alleged as to Count 32 that the defendant, LINDA HASKIN-GOLOGORSKY filed and
17 forged a document and instrument with the county recorder which affected title to, placed an
18 encumbrance on, and placed an interest secured by a mortgage and deed of trust on, real property,
19 which consisted of not more than four dwelling units, with knowledge that the document was false
20 and forged.

21 COUNT 33: PC115.5(b) (Felony)

22 On or about December 19, 2016, in the County of San Mateo, State of California, the crime of False
23 Sworn Statement To Notary Public in violation of PC115.5(b), a Felony, was committed in that
24 LINDA HASKIN-GOLOGORSKY did make a false sworn statement to a notary public, with

1 knowledge that the statement was false in order to induce the notary public to perform an improper
2 notarial act on the instrument and document affecting title to and placing an encumbrance on real
3 property consisting of a single-family residence containing not more than four dwelling units.

4 COUNT 34: PC470A (Felony)

5 On or about October 13, 2016, in the County of San Mateo, State of California, the crime of Forgery
6 Of A Driver's License in violation of PC470A, a Felony, was committed in that LINDA HASKIN-
7 GOLOGORSKY did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a
8 governmental agency driver's license and identification card with the intent that said document be
9 used to facilitate the commission of a forgery.

10 Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that
11 defendant(s) and his or her attorney provide to the People the discovery required by Penal Code
12 Section 1054.3. This is a continuing request pursuant to the provisions of Penal Code Section 1054.7.

13 I declare under penalty of perjury that the foregoing is true and correct except for those things
14 stated on information and belief and those I believe to be true.

15 Executed on February 20, 2017, at San Mateo County, California.

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COMPLAINANT

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